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November 27, 2023

By ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Sylla et al., v. Amazon Labor Union et al.
Civil Case No. 23- 05261 (AMD)
Sealing

Dear Magistrate Merkl:

Plaintiffs do not believe that any portion of the filing at Docket No. 34 should be sealed.

I should note that the Court's November 20, 2023 Order stated: "*Plaintiffs may file their response to Defendants' motion [31](#) under seal, in accordance with the Court's original deadline of today, 11/20/2023. By 11/27/2023, Plaintiffs are directed to file under seal a proposed public version of their response, with specific redactions indicated by highlighting the proposed language to be sealed in a color **other than yellow**. Also by 11/27/2023, Plaintiffs are directed to file a public letter motion that includes any additional authority on which they rely in support of their request for sealing of the specific redactions.*" However, Plaintiffs never sought to file their opposition under seal. All discussion of sealing came from the Defendants. All we said in our Letter of November 17 (Docket No. 32), where we sought to postpone the litigation of the disqualification motion was that : "*we are concerned that if we properly respond, we will be publicly exposing matters which I believe that led to the request by the defendant union to attempt mediation, and to their request that any amended pleadings and related motions be filed under seal.*" This is why we did not cite any authority in the letter that you struck; we were trying to guess at what the Defendant would want to see sealed.

Respectfully submitted,

/s/ *Arthur Z. Schwartz*

Arthur Z. Schwartz

cc: Jeanie Mirer, Attorney for Defendants – by ECF